

August 26, 1992 PP -8 PN 1: 24



Document Processing Center (TS-790)
Office of Toxic Substances
Attn: Section 8(e) Coordinator (CAP Agreement)
Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

8EHQ-92-12247 889200 10466 INIT

Dear Sir or Madam:

Re: 8(e) CAP-0103; Data Submission

The enclosed document is submitted pursuant to the TSCA Section 8(e) Compliance Audit Program and the CAP Agreement between Rohm and Haas Company and the Environmental Protection Agency. This document does not contain confidential business information.

The following is a summary of the contents of the submission under Unit II.C.3 of the CAP Agreement:

Tested Chemical:

CASRN:

Title of Report or Study:

Reportable Effect:

MMPA (93%), methyl 3-mercaptopropionamide 52334-99-3

Acute Toxicity Screening Studies (Report No. 81R-312) Test substance produced neurotoxic signs in the rat oral and rabbit dermal LD50 studies. Also, produced

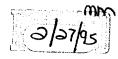
severe eye irritation in the rabbit.

If additional information is required, please contact the undersigned at (215) 592-3139. Thank you.

Sincerely,

Ronald L. Keener, Ph.D.
Regulatory Affairs Director
Product Integrity Department

RLK:so Enclosure



TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

TEST	SUBS	TANCE

KATHON® 886 INTERMEDIATE MMPA MATERIAL KEY 895115-5 PROD CODE 72319 TD NO 81-535

LOT JMM 2:50

REPORT NUMBER

81R 0312

REPORT DATE

REPORT STATUS

FINAL DISTRIBUTION PAGE NUMBER

COMPONENTS/INGREDIENTS 93% MMPA 5% 52 1% MMP 0% S1 1% Toluene < 30 PPM NP -1 90 PPM MeA

TABLE OF CONTENTS

ACUTE ORAL LD50, DEFINITIVE. ACUTE DERMAL LD50, DEFINITIVE,

ACUTE SKIN IRRITATION,

Rat Rabbit

DEFINITIVE,

ACUTE EYE IRRITATION, DEFINITIVE. Rabbit(4-hr contact)

Rabbit

This report and associated raw data are stored in the Archives of the Toxicology Department, Rohm and Haas Company.

The following information is based upon studies conducted by the Toxicology Department, Rohm and Haas Company, and is believed to be correct. This information is furnished to others upon the condition that the persons receiving it shall make their own determination of its suitability for their purposes. No warranty is expressed or implied regarding the accuracy of this information or the results to be obtained from its use.

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

ROHM	ıî.
HAAS	

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

STUDY INITIATED: 11/12/81 STUDY TERMINATED: 12/01/81 ACUTE DEFINITIVE ORAL LD50

0.73 (0.67-0.79) g/kg *

SLOPE: 15.55 PROBITS/UNIT LOG DOSE

REPORT NUMBER

81R 0312

REPORT DATE

REPORT STATUS

FI NAL DISTRIBUTION

PAGE NUMBE

2

PROTOCOL NO. 81P-762

RAW DATA PAGE NO. BOO427,429

SEX: M

SPECIES/STRAIN: RAT (CRCD)
SOURCE: CHARLES RIVER BREEDING LABS

		ONS	SET OF	SIGNS(S)	, RECOV	/ERY(R),	DEATH((D), DA	S POST	-DOSING	DIED/	MEAN	WT g
	DOSAGE	0	1	2	3	4	5	6	7	8-14	DOSED	INIT	TERM
. •	3.24 g/kg	S D10									10/10	204	
•	1.80 g/kg	S 010				1				(10/10	205	
•	1.00 g/kg	S D 9	D 1							1	10/10	205	
<u>.</u>	0.83 g/kg	S D 4	D 4			R	į				8/10	161	267
•	0.68 g/kg	S D 1	D 1	RD 1			1				3/10	163	278
•	0.56 g/kg **	S	D 1		R						1/20	182	285
•	0.31 g/kg **	S			R					j	0/10	211	310

MAXIMUM OBSERVED INCIDENCE AT ANY OBSERVATION TIME (NO. POSITIVE/NO. OBSERVED)

	ט ט :		/ t L 3		
SIGNS	3.24 g/kg	1.80 g/kg	1.00 g/kg	0.83 g/kg	0.68 g/kg
. PASSIVENESS					
'.SCANT DROPPINGS				2/2	8/8
.TREMORS		3/3	8/8	9/10	10/10
↓.ATAXIA		3/3	8/8	9/10	10/10
RED-STAINED MUZZLE		'		1/8	·
5.SALIVATION		1/3	1/8		ĺ
'.CONVULSION		1/3	6/8	4/8	2/9
3.WRITHING		3/3	6/6	,	
RED-STAINED EYES		·	·		
1.BROWN-STAINED	1			1/2	
ANOGENITAL AREA					
.DIARRHEA	1				ł
'.VOCALIZED AFTER DOSING)	2/6	
.AGGRESSIVENESS				2/2	
.YELLOW STAINED	Ì				1/8
UROGENITAL AREA			i		-, -

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

81R 0312 3 REPORT DATE REPORT STATUS FINAL DISTRIBUTION

REPURT NUMBER

MAGE NUMBE

HIS REPORT WAS PRINTED 20M MIDAS ON 06/13/86

	0.56 g/kg **	
PASSIVENESS		1/10
SCANT DROPPINGS	19/19	8/10
.TREMORS	10/20	
. ATAXIA	11/20	
.RED-STAINED MUZZLE		
.SALIVATION	1	ĺ
CONVULSION	2/20	
.WRITHING	2/20	[
.RED-STAINED EYES] 1/20	
.BROWN-STAINED	1	1
ANOGENITAL AREA	1	•
.DIARRHEA	1	1/10
. VOCALIZED AFTER DOSING		
.AGGRESSIVENESS	1/19	1
.YELLOW STAINED	Ì	
UROGENITAL AREA		[

NECROPSY OBSERVATIONS-DECEDENTS (NO. POSITIVE/NO. OBSERVED)

**************************************	D 0 :	SAGE LEV	ELS		
OB SERVATIONS	3.24 g/kg	1.80 g/kg	1.00 g/kg	0.83 g/kg	0.68 g/kg
.NO GROSS CHANGES				1/8	
.GASTRIC MUCOSA					1/3
SEVERELY REDDENED					
.MATTED FUR ON MUZZLE	3/10	4/10	3/10	2/8	
.GLANDULAR GASTRIC MUCOSA -			1/10	3/8	
MODERATELY REDDENED					
.WET MATTED FUR ON MUZZLE	1/10	2/10			
.STOMACH FILLED WITH					1/3
RED FLUID					
.RED WET MATTED FUR ON	1/10				
MUZZLE					
.SEVERE AUTOLYSIS					1/3
.RED-BLACK FOCI ON					1/3
GASTRIC MUCOSA					
.BLACK STRIATIONS ON		!	1/10		
GLANDULAR GASTRIC MUCOSA					
.RED MATTED FUR ON MUZZLE	4/10	4/10	6/10	4/8	1/3
.SMALL INTESTINES MARKED	3/10				
REDNESS					
.SMALL INTESTINES - SLIGHT	5/10	1/10	3/10	1/8	
TO MODERATE REDNESS					

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

ROHM HAAS

81R 0312	4
REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

OFFERNATIONS	10.56 -11- 44	10.01 - // ++			
OBSERVATIONS	0.56 g/kg **	0.31 g/kg **	L		
NO GROSS CHANGES		j	j		
.GASTRIC MUCOSA	Ţ				
SEVERELY REDDENED		1			
.MATTED FUR ON MUZZLE					
.GLANDULAR GASTRIC MUCOSA -	1/1				
MODERATELY REDDENED					
.WET MATTED FUR ON MUZZLE	1				
STOMACH FILLED WITH]	1			
RED FLUID)				
'.RED WET MATTED FUR ON MUZZLE					
SEVERE AUTOLYSIS					
RED-BLACK FOCI ON	İ				
GASTRIC MUCOSA	ĺ	i			
BLACK STRIATIONS ON		1	İ		
GLANDULAR GASTRIC MUCOSA		1			
.RED MATTED FUR ON MUZZLE		}			
SMALL INTESTINES MARKED		}			
REDNESS		i			
S.SMALL INTESTINES - SLIGHT		1			
TO MODERATE REDNESS	<u>'</u>	\	· }		
		<u> </u>			
NECROPS	Y OBSERVATIONS	S-SURVIVORS (NO	. POSITIVE/NO. OBS	ERVED)	
OBSERVATIONS			ELS		
	3.24 g/kg	1.80 g/kg	1.00 g/kg 0.	83 g/kg 0	.68 g/kg
1.NO GROSS CHANGES		1	1	2/2	7/7

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

81R 0312	5
REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

PAGE NUMBE

REPORT NUMBER

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

ROHM	1
HAAS	\triangle

OBSERVATIONS	0.56 g/kg **	0.31 g/kg **	
.NO GROSS CHANGES	19/19	10/10	

STUDY CONDITIONS:

Animals fasted overnight were gavaged with an aqueous solution of the test substance at a constant dose volume of 20 ml/kg.*

STUDY FOOTNOTES:

- a. Animals receiving 3.24 g/kg of the test substance, convulsed, had tremors, ataxia and vocalized and then died within 10 minutes after dosing.
- * Ten rats in groups 1, 2, 3, 6, and 7 were dosed on 11/12/81; and 10 in groups 4, 5, and 6 were dosed on 11/17/81. The rats were killed on 11/25/81, respectively.
- ** The animals were killed on day 13 because day 14 was a company holiday. All signs in these animals were recovered by day 3.

STUDY CONCLUSIONS:

Based on the magnitude of the LD50 alone, this test substance is considered to be "slightly" toxic to rats by ingestion of a single dose (i.e. the rat oral LD50 is between 500 and 5000 mg/kg).

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

ROHM HAAS	1
!HAAS	

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

STUDY INITIATED: 11/24/81

STUDY TERMINATED: 12/08/81

ACUTE DEFINITIVE DERMAL LD50

1.01 (0.83-1.25) g/kg

SLOPE: 8.57 PROBITS/UNIT LOG DOSE RAW DATA PAGE NO. E00407

REPORT NUMBER

81R 0312

REPORT DATE

REPORT STATUS

FINAL DISTRIBUTION PAGE NUMBE

6

>ROTOCOL NO. 81P-740 SPECIES/STRAIN: RABBIT (NEW ZEALAND WHITE)

SEX: M

SOURCE: H.A.R.E.

		01	NSET OF	SIGNS(S)	, RECO	/ERY(R),	DEATH((D), DA	YS POST	-DOSING	DIED/	MEAN	WT g
	DOSAGE	0	1	2	3	4	5	6	7	8-14	DOSED	INIT	TERM
•	1.50 g/kg		S D 4]	5/6	2	2
•	1.14 g/kg 0.87 g/kg	1	S D 4	1	RD 1 RD 1					1	5/6	2	2
•]	S D 1		RD 1				į	1	2/6	2	2
•	0.65 g/kg		S	R					Į		0/6	2	2
•	0.50 g/kg	<u> </u>	<u> </u> S	R		<u> </u>			<u> </u>	<u> </u>	0/6	2	2

MAXIMUM OBSERVED INCIDENCE AT ANY OBSERVATION TIME (NO. POSITIVE/NO. OBSERVED) DOSAGE LEVELS

SIGNS	1.50 g/kg	1.14 g/kg	0.87 g/kg	0.65 g/kg	0.50 g/kg
. PASSIVENESS	1/2				
.ATAXIA	1/2	1/2	2/5	1/6	
.PROSTRATION	1/2	1/2			
.RESPIRATION SLOW, SHALLOW	1/2				
.BROWN-STAINED			1/5		
ANOGENITAL AREA					
.NO TOXIC SIGNS					3/6
'.TREMORS	2/2	1/2	5/5	3/6	3/6
.HYPOTONIA	1/2				
.NYSTAGMUS	ļ ,	1/2			
ABDOMEN DISTENDED	1/1				
.RED MUCUS IN FECES			1/5		

· A Y

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

81R 0312	7
REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

I DEPORT MIMBER

DAGE NIMBE

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

	D 0 S	SAGE LEV	VELS						
OBSERVATIONS	1.50 g/kg	1.14 g/kg	0.87 g/kg	0.65 g/kg	0.50 g/kg				
.GASTRIC MUCOSA SLIGHTLY		1/5							
REDDENED	1								
.TAN FLUID IN THE PERITON-	!	2/5							
EAL & THORACIC CAVITY	!								
.THIN STOMACH WALL	!	1/5]						
.CLEAR FLUID IN THORACID	3/5			į į					
CAVITY	1			•]				
RED FLUID IN THORACIC	[1		1/2						
CAVITY	1								
.WHITENING OF THE SMALL	(1/2						
INTESTINES	!	1.15]				
.BLANCHING OF THE SMALL	!	1/5	!						
INTESTINES	'								
3.NO GROSS CHANGES	2/5	1/5	1/2						
NECROPSY OBSERVATIONS-SURVIVORS (NO. POSITIVE/NO. OBSERVED)									
AD ATT A TT AND	003		V E L S	1					
OB SERVATIONS	1.50 g/kg	1.14 g/kg	0.87 g/kg	0.65 g/kg	0.50 g/kg				

NECROPSY OBSERVATIONS-DECEDENTS (NO. POSITIVE/NO. OBSERVED) _

.NO GROSS CHANGES

SKIN IRRITATION:

Severe erythema; severe edema with pocketing; eschar, blanching, and desiccation. Skin irritation persisted over 14 days.

STUDY CONDITIONS:

The test substance which and been warmed to 30-35 deg. C, was held under an impervious cuff in continuous 24-hr contact with the closely clipped skin.*

STUDY FOOTNOTES:

* After the 24-hr exposure, cuffs were removed and the application sites were gently wiped to remove the residual test substance. Despite this procedure some test substance adhered to the skin and fur. Animals were subsequently observed preening the treated area. The skin of half the numbers of animals in each group were abraded.

STUDY CONCLUSIONS:

Based on the LD50 alone this test substance is considered to be "moderately" toxic to rabbits after a single skin application (i.e. the rabbit dermal LD50 is between 200 and 2000 mg/kg).

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477



REPORT NUMBER 8 PAGE NUMBER 8 REPORT DATE

REPORT STATUS FINAL

DISTRIBUTION

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

PAGE NUMBER

9

REPORT NUMBER

81R 0312

ROHM

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

STUDY INITIATED: 10/20/81

STUDY TERMINATED: 10/27/81 PROTOCOL NO. 81P-747

SKIN IRRITATION

ACUTE DEFINITIVE

RAW DATA PAGE NO. J00256 SEX: M

SPECIES/STRAIN: RABBIT (NEW ZEALAND WHITE)

SOURCE: H.A.R.E.

		SKIN		R	ABBIT NUM	BER, VALU	E		MEAN
TIME	REACTION	CONDITION	1	2	3	4	5	6	VALUE
	ERYTHEMA								
)5 HR	TEST	INTACT	1	0	0	1	4a	0	1.0
24 HR	TEST	INTACT	1	0	0	0	4a	0	0.8
2 HR	TEST	INTACT	0	0	10	0	4a	0	0.7
7 DA	TEST	INTACT	0	0	0	0	4a	0	0.7
	EDEMA	 							
5 HR	TEST	INTACT	0	0	0) 0	4	0	0.7
4 HR	TEST	INTACT	2	0	0	(0	4	0	1.0
2 HR	TEST	INTACT	0	0	0	0	3	ÒO	0.5
7 DA	TEST	INTACT	10	10	0	0	2	10	0.3

72-HR MEAN IRRITATION SCORE 1.2

The 72-hr mean irritation score is the sum of the mean erythema and mean edema values at 72 hr after dosing.

STUDY CONDITIONS:

0.5 ml of the test substance was held under a patch covered with an impervious cuff in continuous 4-hr contact with the closely clipped skin.*

STUDY FOOTNOTES:

a. eschar

*After the 4 hr exposure, cuffs and patches were removed and the application sites were gently wiped with paper towels. The test substance had been warmed to 30 deg. C.

STUDY COMMENTS:

This test substance is considered to be slightly irritating to the skin of rabbits on the basis of the average score at 72 hr. While 5 of the 6 rabbits responded with slight or no irritation, one rabbit responded with severe irritation.

STUDY CONCLUSIONS:

Based on the magnitude of the 72-hr mean irritation score alone, this test substance is considered to be "slightly" irritating to the skin of rabbits (i.e. the 72-hr mean score is between 0 and 2.0).

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477



HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

REPORT NUMBER 81R 0312	PAGE NUMBE
REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

REPORT NUMBER 81R 0312	PAGE NUMBER
REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

ROHM A

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

STUDY INITIATED: 10/19/81 STUDY TERMINATED:11/9/81

ACUTE DEFINITIVE

EYE IRRITATION

PROTOCOL NO. 81P-737

RAW DATA PAGE NO. KOO302

SPECIES/STRAIN: RABBIT (NEW ZEALAND WHITE)

SEX: M

SOURCE: H.A.R.E.

				RAB	BIT	NUMB	ER, VA	LUE			MEAN
TIME	STRUCTURE	1	2	3 a	4	5	6	7 *	8 *	9 *	VALUET
4 hr	CORNEA	5.0	15.0	15.0	15.0	20.0	15.0	20.0	10.0	20.0	14.2
	IRIS	2.5	5.0	5.0	5.0	5.0	2.5	5.0	0.0	0.0	4.2
	CONJUNCTIVAE	12.0	12.0	16.0	14.0	14.0	14.0	16.0	18.0	16.0	13.7
4 hr	CORNEA	5.0	40.0	40.0	10.0	15.0	40.0	20.0	10.0	10.0	25.0
	IRIS	0.0	5.0	5.0	5.0	5.0	5.0	5.0	2.5	0.0	4.2
	CONJUNCTIVAE	14.0b	14.0b	14.0b	14.0b	14.0b	14.0b	14.0	14.0	12.0	14.0
8 hr	CORNEA	5.0	40.0	40.0	10.0	40.0	40.0	20.0	15.0	30.0	29.2
	IRIS	0.0	5.0	5.0	2.5	5.0	5.0	5.0	0.0	2.5	3.8
	CONJUNCTIVAE	8.0b	14.0b	10.0b	6.0b	10.0b	14.0b	16.0	6.0	12.0	10.3
2 hr	CORNEA	5.0c	80.0	40.0	5.0c	40.0	40.0	40.0	15.0	30.0	35.0
	IRIS	0.0	5.0	5.0	0.0	5.0	2.5	5.0	0.0	2.5	2.9
	CONJUNCTIVAE	6.0b	18.0b	8.0b	2.0b	8.0b	8.0b	10.0	6.0	10.0	8.3
16 hr	CORNEA	0.0	80.0	40.0	0.0	30.0	40.0	30.0	30.0	40.0	31.7
	IRIS	0.0	5.0	2.5	0.0	5.0	2.5	2.5	0.0	2.5	2.5
	CONJUNCTIVAE	4.0b	18.0b	6.0b	0.0b	4.0b	4.0	6.0	6.0	12.0	6.0
7 day	CORNEA	0.0	80.0e	10.0e	0.0	10.0e	30.0e	5.0e	10.0	10.0e	21.7
	IRIS	0.0	0.0d	0.0	0.0	0.0	0.0	0.0	0.0	5.0	0.0
	CONJUNCTIVAE	0.0b	20.0b	2.0b	2.0b	0.0b	0.0b	0.0	2.0	4.0	4.0
14 day	CORNEA	0.0	0.0f	5.0e	40.0eg	5.0e	0.0	0.0	5.0	30.0e	8.3
	IRIS	0.0	0.0f	0.0	0.0	5.0	0.0	0.0	0.0	2.5	0.8
	CONJUNCTIVAE	0.0	12.0	0.0b	0.0b	16.0	0.0b	0.0	2.0	4.0	4.7
?1 day		0.0	0.0f	5.0e	0.0	20.0g	0.0e	0.0	10.0	45.0e	h
	IRIS	0.0	0.0f	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	CONJUNCTIVAE	0.0	12.0	0.0	0.06	0.0	0.0	0.0	2.0	6.0	2.0

- † The mean value is calculated from rabbits numbered 1 thru 6 inclusive(unwashed eyes).
- * The treated eyes for these rabbits were washed (flooded with water) approximately 20-30 seconds after dosing.

STUDY CONDITIONS:

0.1~ml of the test substance which had been warmed to 30 deg. C was applied onto the corneal surface.*

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

ROHM	
------	---------

REPORT NUMBER	PAGE NUMBI
81R 0312	12
REPORT DATE	
REPORT STATUS	
REPORT STATUS	-

HIS REPORT WAS PRINTED COM MIDAS ON 06/13/86

TUDY FOOTNOTES:

- *Approximately 1/2 the material was blinked from the eyes after the animals were allowed to blink after dosing.
- a. Rabbit vocalized after application of the test substance.
- b. Hair loss around treated eye
- c. No opacity was grossly visible but less than 25% of the corneal surface was stained after treating with 2% sodium fluorescein solution. The score is the minimum score for corneal opacity and was determined from fluorescein staining and not from gross observation.
- d. Iris unscorable due to denseness of opacity.
- e. blood vessels growing on the cornea.
- f. iris and cornea unscorable due to density of blood vessels and a red raised foci (1 cm in dia.) on the cornea.
- g. Red raised foci (0.5 dia.) on cornea.
- \hat{h} . Mean value is not calculated because the ocular effects of rabbit no. 2 was not scorable.

STUDY CONCLUSIONS:

Based on the duration of the ocular effects alone, thistest substance is considered to be "severely irritating" to the eyes of rabbits (i.e. all ocular effects were not reversible within 21 days after dosing).

TOXICOLOGY DEPARTMENT

SPRING HOUSE, PA 19477

ROHM A

81R 0312	PAGE NUMBE
REPORT DATE	
REPORT STATUS FINAL	
DISTRIBUTION	

HIS REPORT WAS PRINTED ROM MIDAS ON 06/13/86

REPORT CONCLUSIONS:

Based on the results of these studies, this test substance is considered to be slightly toxic to rats by ingestion of a single dose, moderately toxic to rabbits by a single dermal application, slightly irritating to skin of rabbits, and severely irritating to the eyes of rabbits.

ITTEN BY: K. M. KRZYWICKI

R. J. KRAJEWSKI

M. E. DE CRESCENTE

DITED/SIGNED BY: J. E. MCLAUGHLIN

PROVED BY STUDY DIRECTOR: P. K. CHAN

'PROVED BY RES. SECT. MGR.: A. W. HAYES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

Ronald L. Keener, Ph.D.
Regulatory Affairs Director, Product Integrity Department
Rohm and Haas Company
Independence Mall West
Philadelphia, Pennsylvania 19105

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

APR 1 8 1995

your organization under Section (e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 1110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

12246

Sincerely,

Terry R. O'Bryan Risk Analysis Branch

Enclosure

Recycled/Recyclable
Printed with Soy/Canola link on paper that
contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: _	APh	<u>44 w</u> uji		NON-CAP	(CAP)	
Submission number:	12247,	4		TSCA Inventory	Y) N C	>
Study type (circle app	propriate):		- All Control of the second of			_
Group 1 - Dick Cleme	ents (1 copy tota	al)				
ECO	AQUATO					
Group 2 - Ernie Falke	e (1 copy total) SBTOX	SEN	w/NEUF	` . 3 ∮		
Group 3 - Elizabeth N	Margosches (1 c	opy each)				
STOX	СТОХ	EPI	RTOX	GTOX		
STOX/ONCO	CTOX/ONCO	IMMUNO	СҮТО	NEUR		
Other (FATE, EXPO, M	1ET, etc.):				· · · · · · · · · · · · · · · · · · ·	
Notes: THIS IS THE ORIGIN	NAL 8(e) SUBMI	SSION; PL	EASE REFILE	E AFTER TRIAGE (OATABASE ENTRY	r
entire document Notes: Contractor revie	(0 1 2 7)	For Contra	ctor Use Only	pages	74 <i>1</i> 3	

CECATS\TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA: Submission # 8EHQ: 0992 - 12247 TYPE INT SUPP FLWP SUBMITTER NAME: Roby and Compar	Haas	0501 NO INFO 0502 INFO RE 0503 INFO RE 0504 INFO RE DISPOSITION: 0639 REFER T	QUESTED (TECH) QUESTED (VOL ACT) QUESTED (REPORT) O CHEMICAL SCREE TICE	IONS) NG RATIONALE) ENING		POSUNTARY ACTIONS: 0401 NO ACTION RI PORTI D 0402 PRUDIES PLANNI DAIND 0403 NOTIFICATION OF WOR 0404 LARELMSDS CHANGES 0405 PROCESSHANDLING CI 0406 APPAUSE DISCONTINUE 0407 PRODUCTION DISCONT 0408 CONFIDENTIAL	KEROTHERS BANGES D
SUB. DATE: 08 26 92 0	TS DATE: 09	<u> </u>	SRAD DATE: OS				
CHEMICAL NAME: NAMPA	•			2 2 334-99	-3		
misc. Chemical	5			none			
INFORMATION TYPE:	PFC	INFORMATION TYPE:		PFC	INFOR	MATION TYPE:	PFC
0201 ONCO (HUMAN) 0202 ONCO (ANIMAL) 0203 CELL TRANS (IN VITRO) 0204 MUTA (IN VITRO) 0205 MUTA (IN VIVO) 0206 REPRO/IERATO (HUMAN) 0206 REPRO/IERATO (ANIMAL) 0208 NEURO (HUMAN) 0209 NEURO (ANIMAL) 0210 ACUTE TOX. (HUMAN) 0211 CHR. TOX. (HUMAN) 0212 ACUTE TOX. (ANIMAL) 0213 SUB ACUTE TOX (ANIMAL) 0214 SUB CHRONIC TOX (ANIMAL) 0215 CHRONIC TOX (ANIMAL)	01 02 04 01 02 04	0218 HUMAN EXPO 0219 HUMAN EXPO 0220 ECO/AQUA TO 0221 ENV. OCCC/R 0222 EMER INCI O 0223 RESPONSE RI 0224 PROD/COMP/ 0225 REPORTING 0226 CONFIDENTI 0227 ALLERG (HU 0228 ALLERG (AN 0239 METAB/PHAR	ELIFATE OF ENV CONTAM EQEST DELAY CHEM ID RATIONALE IAL IMAN)	01 02 04 01 02 04	0241 0242 0243 0244 0245 0246 0247 0248 0251 0299	IMMUNO (ANIMAL) IMMUNO (HUMAN) CHEM/PHYS PROP CLASTO (IN VITRO) CLASTO (ANIMAL) CLASTO (HUMAN) DNA DAM/REPAIR PROD/USE/PROC MSDS OTHER	01 02 04 01 02 04
TRIAGE DATA: NON-CBI INVENTORY YES	ONGOING REVI	RAT	TOXICOLOGICA	AL CONCERN:		USE: PRODUCT	ION:
CAS SR NO	NO (CONTINUE)	•	MED				
IM TO RMINE	REFFR		HIGH				

CHARKID

L/M/M/H

ACUTE ORAL TOXICITY IN CD RATS IS OF LOW CONCERN BASED ON AN LD50 OF 730 MG/KG. DOSAGE (GAVAGE) AND MORTALITY DATA ARE AS FOLLOWS: 310 MG/KG (0/10); 560 MG/KG (1/20); 680 MG/KG (3/10); 830 MG/KG (8/10); 1000 MG/KG (10/10); 1800 MG/KG (10/10); AND 3240 MG/KG (10/10). AT 680 MG/KG AND ABOVE, TOXIC SIGNS INCLUDED ATAXIA, SALIVATION, TREMORS, AND CONVULSIONS. GROSS PATHOLOGY REVEALED REDNESS OF THE SMALL INTESTINE.

ACUTE DERMAL TOXICITY IN NEW ZEALAND WHITE RABBITS IS OF MEDIUM CONCERN BASED ON AN LD50 OF 1010 MG/KG. DOSAGE (24-HOURS) AND MORTALITY DATA ARE AS FOLLOWS: 500 MG/KG (0/6); 650 MG/KG (0/6); 870 MG/KG (2/6); 1140 MG/KG (5/6); AND 1500 MG/KG (5/6). TOXIC SIGNS INCLUDED TREMORS, PROSTRATION, AND ATAXIA. GROSS PATHOLOGY REVEALED CLEAR FLUID IN THORACIC CAVITY.

DERMAL IRRITATION IN NEW ZEALAND WHITE RABBITS IS OF MEDIUM CONCERN BASED ON SLIGHT IRRITATION (5/6), AND SEVERE IRRITATION (1/6) FROM A 4-HOUR EXPOSURE TO 0.5 ML.

ACUTE EYE IRRITATION IN NEW ZEALAND WHITE RABBITS IS OF HIGH CONCERN BASED ON IRREVERSIBLE, SEVERE IRRITATION (9/9) FROM EXPOSURE TO 0.1 ML. TOXIC SIGNS INCLUDED HAIR LOSS AROUND TREATED EYE, BLOOD VESSELS GROWING ON CORNEA, AND RED RAISED FOCI ON CORNEA.